

EXHIBIT A



To: the Schuylkill county Prothonotary
Bridget Miller,

Re: Cieniawa, Vs. Brittain, Civil Action #
S-305-20

Dated 10-11-2020

I was forced to use this yellow
paper, I am also IFP, CAN you please
file this supplemental complaint,

Also, can you make 9 copies of this
summons AND Notice, AND the complaint,
seal it, sign it, AND issue your service
upon these defendants - I have NO access or
way to make copies -

Your, Service upon AS Required;

To: COL. OBOYLE, COL. STORM, COL. GORNEL, COL.
MORRIS, CO3. SIMPSON, SUPERINTENDANT BRITTAIN,
DUPTY GOURLEY AND COY REESE ALL AT

SCI-FRACKVILLE 1111 ALTAMONT BOULEVARD
FRACKVILLE PA 17931

SERVICE UPON TO:

~~AND~~ CO-CHIEF OFFICIAL OF THE OFFICE
OF SPECIAL INVESTIGATIONS AND INTEL-
LIGENCE "AS JOHN DOE," AT 1920 ~~FRACKVILLE~~
Technology Parkway, ~~FRACKVILLE~~ Mechanicsburg
PA 17050

PLEASE RETURN A service copy, signed,
stamped and dated, with a Docket entry
sheet attached, after you enter this complaint
and summons into the docket, AND service my
summons ~~Frank~~ and complaint by mail as
indicated.

Please Thank You...

Also, can you send me 3 of your
precipe forms for forwarding to the court
adm. to attach to a few motions i'm doing
up??

Thank you

JASON Cieniawa #M20869
Sci - Frackville
1111 Altamont Boulevard
Frackville PA 17931

IS/ J 

SCHUYLKILL COUNTY COURT OF COMMON PLEAS - PENNSYLVANIA
CIVIL DIVISION

JASON CIENIAWA

5-305-2020

VS.

KATHY BRITTAIN, ETAL.

SUMMONS

TO FIRST SHIFT OFFICER OBOYLE, AND
 TO THE 2ND. SHIFT OFFICERS WORKING IN THE
 RESTRICT HOUSING UNIT OF - EB BLOCK; CO3 SIMPSON;
 CO1. STORM; CO1. GORNEL; CO1. MERRIS AND SEVERAL JOHN
 DOES OF A CO1, CO2, CO3, RANKS - SUPERINTENDANT
 KATHY BRITTAIN, DEPUTY SUPERINTENDANT MICHAEL
 GOURLEY, SECURITY CAPTAIN REESE, IN YOUR OFFICIAL
 AND INDIVIDUAL CAPACITIES, EMPLOYEES OF SCI
 FRACKVILLE, 1111 ALTAMOUNT BOULEVARD, FRACKVILLE,
 PA. 17931 - AND TO CHIEF OFFICER OF THE OFFICE
 OF SPECIAL INVESTIGATIONS - 1900 TECHNOLOGY PKWY., MACANISBURG, PA 17050,
 YOU ARE HEREBY SUMMONED AND REQUIRED TO
 SERVE UPON THE PLAINTIFF JASON CIENIAWA,
 MZ 0869 - 1111 ALTAMOUNT BOULEVARD, FRACKVILLE PA.
 17931 - AND UPON THE COURT AT 401 N. 2ND STREET,
 POTTSVILLE PA. 17901 - PROTHONOTARYS OFFICE, AN
 ANSWER TO THE COMPLAINT WHICH IS HEREBY
 SERVED UPON YOU - WITHIN 20 DAYS AFTER
 SERVICE OF THIS SUMMONS UPON YOU --- IF YOU
 FAIL TO DO SO A JUDGMENT BY DEFAULT WILL
 BE TAKEN AGAINST YOU FOR THE RELIEF AS IS
 DEMANDED IN THIS COMPLAINT ---

PROTHONOTARY

 PROTHONOTARY OFFICE
 2020 OCT 16 PM 1:16
 SCHUYLKILL COUNTY PA
 17901
DATED: / /

SCHUYLKILLE COUNTY COURT OF COMMON PLEAS - PENNSYLVANIA
CIVIL DIVISION

JASON CIENTAUA

VS.

5-305-2020

KATHY BRITTAIN, ETAL.

SUPPLEMENTAL COMPLAINT

AND NOW THIS 11TH DAY OF OCTOBER 2020
 SUMMONS THE FOLLOWING DEFENDANTS TO ANSWER
 TO THE FOLLOWING CHARGES IVE MADE AGAINST
 AS FOLLOWS-

- 1). PLAINTIFF IS JASON CIENTAUA NO. MZ0869,
 OF SCI-FRACKVILLE 1111 ALTAMONT BOULEVARD,
 FRACKVILLE PA. 17931...
- 2). PLAINTIFF FILED AN ORIGINAL CIVIL ACTION
 BY SUMMONS ON 3-22-2020, AT WHICH WAS STIKED
 AND AMENDED AND SERVED ON THE ORIGINAL
 DEFENDANTS ON 5-13/14-2020...
- 3). PLAINTIFF HAS FILED SEVERAL SUPPLEMENTAL
 COMPLAINTS SINCE - FOR RETALIZATION, OFFICAL
 ABUSE AND HARASSMENT- TO WRT THESE FOLLOW-
 ING CLAIMS ARE OF THAT NATURE...
- 4). PLAINTIFF UPTIL FEBRUARY OF 2020 WAS
 IN MID PROCESS OF EXHAUSTING IN HOUSE
 GRIEVANCE REMEDIES FOR SEVERAL INCIDENCES,
 AND SOON AFTER BECAME A TARGET OF
 HARASSMENT TO WRT SEVERAL DEFENDANTS HAVE
 BEGAN TO COHORT TOGETHER WITH THEIR CO-
 WORKERS IN A CAMPAIGN OF DAILY ACTS OF
 CELL SEARCHS WEEKLY AND DESTROYING AND STEALING
 PLAINTIFFS PROPERTY, TO CONSETTENTLY REPUSSING
 TO OPEN PLAINTIFFS DOOR FOR MEALS, YARDS,
 PASSES-- ECT-- TO INCLUDE DEFENDANT HANNON
 IN 3-4-2020 AT PLAINTIFFS DOOR QUOTING HIS
 WORDS- HE WILL JUICE UP FALSE CONDUCTS ON
 PLAINTIFF TO BURY PLAINTIFF IN THE
 HOLE SOLITARY CONFINEMENT FOR SO LONG
 WITH NOTHING AND NO OUT SIDE CONTACT
 UNTILL PLAINTIFF FORGETS HIS NAME...
- 5). PLAINTIFF REMAINED IN FEAR FOR HIS
 LIFE, SAFETY AND HEALTH SINCE DEFENDANT
 HANNON MADE THAT THREAT-- TO WRT
 AN ACCUMULATION OF ON GOING ACTS AS
 STATED IN THE ~~MAX~~ AMENDED AND THE
 SEVERAL SUPPLEMENTAL COMPLAINTS LISTED ABOVE-

6).

PLAINTIFF ON JULY 20TH, 2020 BY US MAR SENT THE OFFICE OF INTERNAL AFFAIRS, SPECIAL INVESTIGATIONS AND INTELLIGENCE AT CENTRAL OFFICE - A LETTER OUTLINING SEVERAL ISSUES THAT ARE ALL PART OF THIS CIVIL ACTION - THAT THE PLAINTIFF KNOWS SEVERAL OFFICERS AND DATED TWO NURSES WHO WORK AT SCI-FRACKVILLE, AND PRIOR TO HIS IMPRISONMENT HERE, HE AND HIS FAMILY HAD SEVERAL ISSUES, A FBW VIOLENT CONFLICTS WITH, AND IS MOST LIKELY A MAJOR FACTOR OF ALOT OF THE HARASSMENT AND ABUSE AGAINST PLAINTIFF -- BUT, SOMEHOW DEFENDANT REESE OF SCI-FRACKVILLE ENDED UP WITH SAID LETTER ON 7-21-2020, AND PUT THE PLAINTIFF IN THE KNU SOLITARY CONFINEMENT UNIT -- CAPTIAN REESE CONDUCTED A INVESTIGATION AND ON 09-11-2020, PUT PLAINTIFF IN FOR A STAFF SEPERATIONAL SECURITY TRANSFER --

7). SOON AFTER PLAINTIFF WAS PLACED IN THE HOLE ON SOLITARY CONFINEMENT ON 24/7 LOCK DOWN 07-21-2020, SEVERAL OFFICERS BEGAN TO BURN PLAINTIFF FOR SHOWERS, YARDS, LAW LIBRARY AND EVERYTHING ELSE -- SOON AFTER 09-11-2020 THE GUARDS BEGAN A CAMPAIGN TO ISSUE PLAINTIFF MISCONDUCT - 5 TO DATE, FOR THINGS PLAINTIFF IS NOT DOING - DEFENDANT SRMPSON TOLD PLAINTIFF TO HIS FACE, THEY - MEANING THE DEFENDANTS - INTEND TO BURY PLAINTIFF IN MISCONDUCTS - BECAUSE IT IS STANDARD DOC PROCEDURE THAT AN INMATE MUST COMPLEAT HIS MISCONDUCT TIME BEFORE TRANSFERRED -- DEFENDANT SRMPSON HAS WROTE 3 OF THESE FALSE CONDUCT CHARGE REPORTS HIM SELF -- AS A SUPPLEMENTLY FILED COMPLAINT AND SUMMONS INDICATES -- FILED RECENTLY -- DEF. SRMPSON HAS EVEN PARTICIPATED WITH DEFENDANT SMOKE RECENTLY IN AN ACT OF DESTROYING AND STEALING LEGAL DOCUMENTS --

TO WIT IS A BASIC HISTORY OF FACTS - AND NOW PLAINTIFF CHARGES THAT -

8). DEFENDANTS SRMPSON, MCKEYS, GORNEL, STORM AND SEVERAL JOHN DOES ON AND SHIFT WORKING THE RNU/HOLE ON EB-BLOCK WHERE PLAINTIFF WAS MOVED TO ON 10-06-2020 HAVE DENIED THE DRIVER MEAL ON AND SHIFT AT 1700 HOURS DAILY SINCE 10-06-2020 - LEAVING THE PLAINTIFF TO SURVIVE ON THE OTHER TWO TINY MEALS AT BREAKFAST AND LUNCH - WELL BELOW 1000 CALORS -- THEY ARE FALSLY REPORTING IT SAYING PLAINTIFF IS REFUSING THESE MEALS --

9). DEFENDANT SIMPSON HAS NOW FALSIFIED SEVERAL MISCONDUCT REPORTS FOR THREATS AND ABUSIVE LANGUAGE IN THE LAST COUPLE OF WEEKS. A.F. OBOYLE ISSUED A FALSIFIED REPORT FOR THREATS, AND DEFENDANT MORRIS ISSUED ONE FOR THREATS ON 10-9-2020, 10-6-2020, FALSIFIED LEGAL DOCUMENTS THAT ARE BEING USED TO:

- 1). STOP PLAINTIFFS STAFF SECURITY TRANSFER- THEY ARE OBSTRUCTING AND INTERFERING WITH GOVERNMENTAL FUNCTIONS, BY FALSIFYING MISCONDUCTS IN ORDER TO CAUSE PLAINTIFF TO REMAIN AT THIS PRISON WITH THE SAME, AND BY THE SAME, OFFICERS THAT SECURITY DETERMINED PLAINTIFF NEEDED A SEPERATION AND PROTECTION FROM-- HOW CONVENIENT TELL THE CONDUCT TIME IS DONE--WHICH SEEMS FARAWAY--
- 2). TO DENY PLAINTIFF ACCESS TO SHOWERS, THE LAW LIBRARY, PHONE, VIZITS, AND ANY OTHER MOVEMENT OUTSIDE HIS CELL--

10). THESE DEFENDANTS AND A COHORT OF JOHN DOES ARE STATISTICALLY CAMPAIGNING- A SERIOUS SCAM TO TARGET THE PLAINTIFF- THEY ARE VOUCHING FOR EACH OTHERS LIES AND FALSE REPORTS TO THEIR SUPERIORS AGAINST THE PLAINTIFF TO JUSTIFY THEIR USE OF OBSTRUCTION OF GOVERNMENTAL FUNCTIONS OF THE PLAINTIFFS SECURITY TRANSFER, ACCESS AND USE OF THE PRISON GRIEVANCE SYSTEM, AND USE AND ACCESS OF THE COURT-- THESE NEW DEFENDANTS SINCE ~~EARLY~~ 07-21-2020, HAVE USED THEIR OFFICIAL POWER TO PURSUE BOTH CRIMINAL AND CIVIL CRIMS OF HARASSMENT, OBSTRUCTION, RETALIATION, FABRICATION OF PHYSICAL EVIDENCE, AND INTIMIDATION BY DOING SO AMOUNTING TO DAILY FEAR OF PLAINTIFFS HEALTH AND WELL BEING, A PSYCHOLOGICAL ABUSE, TO WIT PLAINTIFF IS ALREADY A MENTALLY DEVIATED AND HANDICAP INDIVIDUAL--

11). PLAINTIFF BEGANT TO ~~STATE~~ CONTINUE GRIEVANCE REMEDIES TWO WEEKS AGO-- AND WAS SENT DEFENDANT BRITTAIN AND GOURLEY, REESE ~~AND JOHN DOE~~ SUPERIOR. ~~AT CENTRAL OFFICE OF SP~~ WHO ARE SUPERVISORY AND SECURITY OFFICIALS AT THIS PRISON, AND ALSO TO JOHN DOE THE CHIEF OFFICER AT THE OFFICE OF SPECIAL INVESTIGATIONS CENTRAL OFFICES, SEVERAL MEMOS AND COMPLAINTS OUTLINE THE FALSE CONDUCT CHARGES AND THESE VIOLATIONS AS STATED HEREIN AND THE THREE OTHER SUPPLEMENTAL COMPLAINTS FILED RECENTLY--

11) CONTINUES - FROM PAGE 4). -
 14 REQUESTS, COMPLAINTS TO THE DEPT IN
 PARAGRAPH 11 HERE HAVE IGNORED EVERY LAST
 COMPLAINT - AND HAVE FAILED TO DO ANY
 THING TO STOP, PREVENT OR REPREMEND THE
 COHORT OF OFFICERS FROM THESE ON GOING
 ACTS - THESE CHIEF OFFICER OF THE
 SPECIAL INVESTIGATIONS INTERNAL AFFAIRS
 OFFICE CENTRAL OFFICE, THE CAPT. OF
 SECURITY REESE, SUPERVISOR BRITTAIN,
 DEPUTY GOURLY HAVE ALLOWED THEIR RANKING
 CO1 CO2 CO3 DEFENDANTS TO CAREY OUT THESE
 ACTS -

12). PLAINTIFF IS IN SOLITARY CONFINEMENT,
 DENIED SINCE ~~7-21~~ 2020, AT LEAST ONE
 MEAL A DAY TO GET AN ADEQUATE AMOUNT OF
 CALORIES AND NUTRIENTS ARE DENIED - SINCE
 THE ONLY FOOD AVAILABLE IS THE 3 MEALS
 A DAY - USUALLY SECOND SHIFT AND BY THE CO1 CO2
 RANKS - 2). PLAINTIFF HAS HAD ACCESS TO 3
 SHOWERS IN 3 MONTHS. 3). DENIED GRIEVANCE
 FORMS AND USE OF GRIEVANCE UNTIL TWO
 WEEKS AGO AND IMMEDIATE RETALIATION AND
 THREATS AGAINST PLAINTIFF INCREASED TO A
 POINT PLAINTIFF NO FEARS OFFICERS WILL TRY
 TO PLANT CONTRABAND OR OTHERWISE FALSIFY
 CRIMINAL CHARGES AND OR CAUSE THE DEATH
 OF PLAINTIFF. 4). PLAINTIFF HAS BEEN
 DENIED HIS ASTHMA MEDICATION FOR 4 MONTHS
 HAS BEEN LEFT TO SUFFER DENIED MEDICAL
 FOR SEVER PAIN IN HIS BACK NECK AND
 LEGS AND HEAD FROM SPINAL FRACTURES AND
 NERVE DAMAGES. 5). PLAINTIFF IS SUFFERING
 HEAD BRAIN TRAUMA FROM TWO FALLS OFF A
 TOP BUNK OF DIZZINESS, LETHARGY, AND
 FORGETFULNESS, IS BARELY ABLE TO GET UP
 OR MOVE DO TO STIFFNESS AND PAIN AND
 FOR ABOUT 10 MONTHS SUPERVISORY AND
 SECURITY OFFICIALS HAVE IGNORED AND
 FAILED TO TAKE MEASURES TO STOP THESE
 ACTS AND CAUSE CORRECT CARE -

13). DUE TO THE CIRCUMSTANCES IN
 WHOLE, THE PLAINTIFF SHOULD HAVE BEEN
 GIVEN AN IMMEDIATE TRANSFER OUT OF
 SU - FRACKVILLE, NOT LEFT HERE TO THESE
 DEFENDANTS ON GOING VIOLATIONS, AND
 LEFT TO HAVE THE SAME OFFICERS THAT
 SECURITY SAID PLAINTIFF NEEDED PROTECTION
 AND SEPERATION FROM, TO BE ABLE TO HAVE
 THEM AND THEIR FELLOW BUDDY CO-WORKERS
 BUCK THE SYSTEM BY ISSUING FALSE MISCON-
 DUCTS IN ORDER TO STOP PLAINTIFF'S TRANSFER.

14). TO WRT PLAINTIFF CHARGES:
 SUPERINTENDANT BRITTAIN AND DEPUTY COURLEY
 WITH INTENTIONAL DERELICTION OF DUTY
 AS SUPERVISORY POSITION - A NEGLIGENCE
 TO ALLOW PHYSICAL AND PSYCHOLOGICAL DAMAGES,
 BY YOUR OFFICERS YOUR SUPPOST TO CONTROL AND
 REPRIMAND - YOU HAVE IGNORED OVER 30
 REQUESTS AND COMPLAINTS, TO WRT SEVERAL
 FROM CENTRAL OFFICE, FROM PLAINTIFF
 ABOUT SERIOUS ON GOING DENIED MEDICAL,
 DENIED MEALS, DENIED SHOWERS, DENIED
 LAW LIBRARY, BUT, AND HAVE PERMITTED
 YOUR OFFICERS TO RETALIATE AND TRY
 TO INTIMIDATE PLAINTIFF FROM PURSUING
 GRIEVANCE AND COURT CLAIMS AND REMEDY
 AGAINST YOU AND YOUR UNDERLINGS -- YOU
 HAVE IGNORED PLAN OUT THREATS AND FALSE
 MISCONDUCT ALLEGATIONS FROM YOUR OFFICERS
 UPON PLAINTIFF --

15). DEFENDANT REESE AND OF FRANKVILLE
 SECURITY AND CHIEF JOHN DOE OF THE
 OFFICE OF SPECIAL INVESTIGATIONS
 CENTRAL OFFICE - YOU HAVE NEGLECTED
 YOUR DUTY TO PROTECT AND PREVENT SER-
 IOUS ACTS OF OFFICIAL OBSTRUCTION AND
 INTERFERENCE BY SCI - FRANKVILLE OFFICERS
 FROM SUPERVISORY DOWN TO COI RANKS - YOU
 HAVE NEGLECTED TO TAKE MEASURES TO
 HAVE PLAINTIFF IMMEDIATELY TRANSFERRED
 OUT OF THIS PRISON AND OUT OF THESE
 VIOLENT AND UNHUMAN CONDITIONS -- YOU
 HAVE ALLOWED OFFICIALS HERE TO TAKE
 A COURSE OF ACTION OF FALSIFYING MIS-
 CONDUCTS AGAINST PLAINTIFF FOR THE
 SOLE PURPOSE OF STOPPING PLAINTIFF FROM
 BEING ABLE TO TRANSFER - YOU ALLOWING
 THE SAME PEOPLE YOU SAID I NEED A
 SEPARATION AND TRANSFER FROM, TO ABUSE
 A LOOP HOLE IN DOC CUSTOMS - AND STOP
 PLAINTIFF FROM BEING ABLE TO TRANSFER --

NOTE: A TRANSFER GOES ON HOLD PENDING
 COMPLETION OF MISCONDUCT TIME -- TO WRT
 5 FABRICATED CONDUCT CHARGES HAVE BEEN
 WROTE IN THREE WEEKS TO FORCE PLAINTIFF
 TO REMAIN HERE TO BE BASICALLY TORTURED
 ABUSED AND PERMANENTLY HARMED, AND
 SLOWLY STARVED AND POSSIBLE DIE OF
 DENIED ASTHMA MEDICATION AND TREATMENT
 OF HEAD TRAUMA --

16). COI. O'BOYLE, COI. MEYER, COI. CRESS,
 COI. GORNER, COI. MORRIS, COI. STORM, CO3
 SIMSON YOU ARE OF SEVERAL OFFICERS AND
 JOHN DOES WHO HAVE CONSPIRED TO VOUCH FOR
 EACH OTHERS FABRICATED FALSE ALLEGATIONS,
 YOU HAVE DENIED A MEAL A DAY, ALL SHOWERS,
 LAW LIBRARY, AND MOVEMENT WITH YOUR FALSE
 REPORTS AND YOUR INTENTIONAL ABUSE OF DUTIES,
 DONE OF DONE

TO OBSTRUCT AND INTERFERE WITH THE PLAINTIFFS GOVERNMENTAL FUNCTIONS, YOUR INTENTIONALLY ABUSING A LOOP HOLE TO KEEP PLAINTIFF FROM HIS SECURITY TRANSFER, YOUR INTENTIONALLY SLOWLY STARVING PLAINTIFF BY DENYING A MEAL A DAY AND FALSELY REPORTING I'M DENYING SAID MEAL, YOUR ENGAGING IN A CONSPIRACY TO DENY THE PLAINTIFF ACCESS AND USE OF THE GRIEVANCE PROCEDURE, YOUR THREATENING AND HARASSING AND TRYING TO INTIMIDATE PLAINTIFF TO DROP HIS COURT AND PRISON COMPLAINTS, AND YOUR ENGAGING IN INTENTIONAL CONSPIRACY WITH OFFICERS WHO PLAINTIFF HAD PRIORLY HAD SERIOUS AND SOME VIOLENT INTERACTIONS WITH WHILE OUT SIDE OF PRISON, WHO ARE USING THEIR NOW OFFICAL POWER TO MAKE EVERY LAST ASPECT OF PRISON AS MISERABLE, AS POSSIBLE, TO STEAL AND DESTROY PERSONAL PROPERTY, TAKE APART MY CELL AT EVERY CHANCE, AND SEGREGATE ME IN A CELL FOR MY ENTIRE SENTENCE ALONE, WITH NO CONTACT WITH FAMILY OR OTHER INMATES--

DAMAGES

18. TO WIT YOUR ALIENATING THE EFFECTS OF THE PHYSICAL DAMAGES PLAINTIFF HAS SUFFERED OVER THE LAST YEAR-- YOUR PSYCHOLOGICALLY DAMAGING THE PRE-EXISTING WITH NEW WORSENING TRAUMA UPON PLAINTIFF, PLAINTIFF IS SCARED, UNABLE TO SLEEP, HAS NIGHTMARES, IS WAKEN UP, AND DURING THE DAY WHILE AWAKE BECOMING REAL JUMPY AND SHOCKED BY ANY SLIGHT NOISE OR STAFF INTERACTION, PLAINTIFF IS REAL STIFF AND UNMOBILE FOR A GOOD PART OF THE DAY, PLAINTIFF IS WAKEN AT NIGHT GASPING FOR AIR, HAS CRIED AND SHOOK WITH UNCONTROLLED ANXIETY AND FEAR UNDER HIS BUNK FOR HOURS, A FEW DAYS A WEEK FOR THE LAST 7 OR SO WEEKS,

TO WIT PLAINTIFF SEEKS \$500,000 IN US DOLLARS AGAINST EACH DEFENDANT IN THIS SUPPLEMENTAL COMPLAINT, FOR EACH MALICIOUS ACT AND FAILURE TO ACT CLAIMED HERE IN, AGAINST YOU IN YOUR OFFICAL AND INDIVIDUAL CAPACITY, IN THE NATURE OF PUNITIVE AND COMPENSATORY DAMAGES--

PLAINTIFF SEEKS THE SUPERVISORY OF SCI- FRACKVILLE, THE OFFICE OF THE SECURITY AT SCI FRACKVILLE, AND THE CHIEF OF SPECIAL INVESTIGATIONS OF CENTRAL OFFICE TO TAKE IMMEDIATE ACTION TO TRANSFER PLAINTIFF OUT OF SCI- FRACKVILLE--

PLAINTIFF SEEKS COSTS OF LITIGATION
 AND ALL OTHER EQUITABLE FAIR AND JUST RELIEF
 THE COURT SEES PROPER--
 BY COURTS ORDER OR THIS REQUEST--
 PLAINTIFF SEEKS AN IMMEDIATE CONFERENCE
 WITH THE SCHUWILL COUNTY DA, OFFICE AND
 THE ATTORNEY GENERAL OFFICE TO PURSUE
 CRIMINAL CHARGES FOR SEVERAL CRIMINAL
 VIOLATIONS RELATED TO OBSTRUCTION AND
 INTERFERENCE OF LAW AND GOVERNMENTAL
 FUNCTIONS PURSUANT TO 18 PA. CSA § 5101; FOR
 FABRICATION OF FALSE EVIDENCE AND TAMPERING WITH
 EVIDENCE PURSUANT TO 18 PA. CSA § 4910; FOR
 AGGRAVATED HARASSMENT PURSUANT TO 18 PA. CSA § 5170;
 FOR THREATS AND OTHER IMPROPER INFLUENCE
 IN OFFICIAL AND POLITICAL MATTERS 18 PA. CSA §
 4702; FOR THEFT 18 PA. CSA § 3921; AND FOR OTHER
 SEXUAL ASSAULTIVE ACTS - PRIA VIOLATIONS--
 I WANT PURSUED ALL AGAINST THESE
 DEFENDANTS OF THIS CIVIL ACTION EVERY
 LAST DEFENDANT ABOUT 30 TOTAL FOR THEIR
 ACTIONS--

THE HEREIN IS TRUE AND CORRECT

SERVICE BY SUMMONS - BY PROTHONOTARY

BY PLAINTIFF

JASON CERNIAWA #M20864

SUB - FRACKVILLE

111 ALTAMONT BOULEVARD
 FRACKVILLE PA. 17931

1/31/2021 

**IN THE COURT OF COMMON PLEAS
OF SCHUYLKILL COUNTY, PENNSYLVANIA**

JASON CIENIAWA,	:	
	:	
Plaintiff	:	
	:	No. 20-0305
v.	:	
	:	
KATHY BRITTAIN, JAMES MEINTEL,	:	
MICHAEL GOURLEY, KAREN HOLLY	:	
– MEDICAL, MARY JOY MONSALUDE,	:	
CO2 SHULTZ – C-BLOCK, CO1 LUCAS	:	
– C-BLOCK, SANKAS –	:	
MAINTENANCE, CO3 LT. HANNON,	:	
PA. TONY – MEDICAL, JOHN DOES,	:	
JANE DOES OF SCI FRACKVILLE and	:	
JOSEPH SILVA OF CENTRAL OFFICE,	:	
Defendants	:	

**PRAECIPE TO CONSENT TO AMENDMENT OF
COMPLAINT**

To the Prothonotary:

Plaintiff Jason Cieniawa filed a “Supplemental” Complaint that is construed as an amended complaint on October 16, 2020 without seeking leave of Court. The Amended Complaint was served on Defendants October 22, 2020. Pursuant to Pennsylvania Rule of Civil Procedure 1033(a), Plaintiff is to seek consent of the adverse party prior to filing an amended complaint. Please consider this praecipe as granting consent to the amendment of the complaint.

Respectfully submitted,

**JOSH SHAPIRO
Attorney General**

By: 

**ALLISON L. DEIBERT
Deputy Attorney General
Attorney ID 309224**

**Office of Attorney General
15th Floor, Strawberry Square
Harrisburg, PA 17120**

Phone: (717) 705-2532

adeibert@attorneygeneral.gov


Date: October 23, 2020

KAREN M. ROMANO
Chief Deputy Attorney General
Civil Litigation Section

**Counsel for Defendants Brittain, Meintel,
Gourley, Holly, Schultz, Lucas, Sankus,
Hannon and Silva**

CERTIFICATE OF COMPLIANCE

I, Allison Deibert, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



ALLISON DEIBERT
Deputy Attorney General

**IN THE COURT OF COMMON PLEAS
OF SCHUYLKILL COUNTY, PENNSYLVANIA**


JASON CIENIAWA,	:	
	:	
Plaintiff	:	
	:	No. 20-0305
v.	:	
	:	
KATHY BRITTAIN, JAMES MEINTEL,	:	
MICHAEL GOURLEY, KAREN HOLLY	:	
– MEDICAL, MARY JOY MONSALUDE,	:	
CO2 SHULTZ – C-BLOCK, CO1 LUCAS	:	
– C-BLOCK, SANKAS –	:	
MAINTENANCE, CO3 LT. HANNON,	:	
PA. TONY – MEDICAL, JOHN DOES,	:	
JANE DOES OF SCI FRACKVILLE and	:	
JOSEPH SILVA OF CENTRAL OFFICE,	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, Allison L. Deibert, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on October 23, 2020, I caused to be served a true and correct copy of the foregoing document titled Praecipe to Consent to Amendment of Complaint to the Plaintiff through the Department of Corrections. This alternative method of service is being used due to COVID-19.

VIA U.S. MAIL

Jason Cieniawa, MZ-0869
SCI Frackville
Pro Se Plaintiff



ALLISON L. DEIBERT
Deputy Attorney General